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April 18, 2022

Via ECF

The Honorable Vernon S. Broderick United States District Judge United States District Court Southern District of New York 40 Foley Square New York, NY 10007

Re: <u>United States v. John Oluwasanmi</u> 22 Cr. 85 (VSB)

Dear Judge Broderick,

APPLICATION GRANTED SO ORDERED A. VERNON S. BRODERICK U.S.D.J. 04/19/22

The Sentencing in this matter is hereby adjourned to June 21, 2022 at 12:00 pm.

I write on behalf of Mr. Oluwasanmi to respectfully request a one-month adjournment of the May 10, 2022 sentencing proceeding (and associated filing deadlines) in the above-captioned matter. This is the defense's first request for an adjournment. The government consents to this request.

The undersigned recently completed a month-long trial and, given Mr. Oluwasanmi's age and limited mobility and access to technology, needs additional time to confer with Mr. Oluwasanmi regarding the defense's forthcoming sentencing submission. The parties are also in discussions regarding an issue the defense believes might be relevant to sentencing. So that the defense may have additional time to complete its sentencing submission and the parties may have time to continue their conversations, we respectfully request a one-month adjournment of sentencing in this matter.

We thank the Court for its consideration of this request.

Respectfully submitted, /s/ Neil Kelly Neil P. Kelly Assistant Federal Defender (212) 417-8744

cc: AUSA Sarah Kushner